

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, TYLER MAGILL, APRIL
MUNIZ, HANNAH PEARCE, MARCUS
MARTIN, NATALIE ROMERO, CHELSEA
ALVARADO, and JOHN DOE

Plaintiffs,

v.

Civil Action No.: 3:17CV00072

JASON KESSLER, RICHARD SPENCER,
CHRISTOPHER CANTWELL, JAMES ALEX
FIELDS, JR., VANGUARD AMERICA,
ANDREW ANGLIN, MOONBASE
HOLDINGS, LLC, ROBERT “AZZMADOR”
RAY, NATHAN DAMIGO, ELLIOTT
KLINE a/k/a ELI MOSELEY, IDENTITY
EVROPA, MATTHEW HEIMBACH, MATTHEW
PARROTT a/k/a DAVID MATTHEW PARROTT,
TRADITIONALIST WORKER PARTY,
MICHAEL HILL, MICHAEL TUBBS, LEAGUE
OF THE SOUTH, JEFF SCHOEP, NATIONAL
SOCIALIST MOVEMENT, NATIONALIST
FRONT, AUGUSTUS SOL INVICTUS,
FRATERNAL ORDER OF THE ALT-KNIGHTS,
MICHAEL “ENOCH” PEINOVICH, LOYAL
WHITE KNIGHTS OF THE KU KLUX KLAN,
and EAST COAST KNIGHTS OF THE KU KLUX
KLAN a/k/a EAST COAST KNIGHTS OF THE
TRUE INVISIBLE EMPIRE,

Defendants.

FIELDS’ RESPONSE TO PLAINTIFFS’ MOTION TO MODIFY SANCTIONS ORDER

COMES NOW JAMES ALEX FIELDS, by and through Counsel, and in response to
Plaintiffs’ motion to modify Judge Hoppe’s October 15, 2021 Order on Sanctions against
Defendant James Alex Fields, Jr. states:

Fields does not oppose the motion to the extent it seeks to prevent testimony on behalf of a co-Defendant. Fields does oppose Plaintiffs' proposed jury instruction. Given the Court's ruling, Fields will not testify at trial, and the jury should be free to infer what it will from that. The sanction is sufficient in and of itself.

Fields does not oppose the four adverse inference jury instructions in Plaintiffs' motion and concedes they comply with Judge Hoppe's Order and meet all applicable standards following Fields' assertion of his constitution rights.

Respectfully submitted,

JAMES ALEX FIELDS, JR.

By Counsel

/S/

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Counsel for Defendant James A. Fields, Jr.

CERTIFICATE OF SERVICE

I hereby certify that on 22nd day of October, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to all ECF participants.

I further certify that on October 22, 2021, I also served the following non-ECF participants, via electronic mail as follows:

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